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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

VICTOR PEREZ, as Special Administrator of  
the Estate of CARLOS PEREZ, deceased;  
VICTOR PEREZ, as the Guardia Ad Litem for  
S.E.P., a minor; VICTOR PEREZ, as the Guardia  
Ad Litem for A.I.P., a minor,

Plaintiffs,

vs.

STATE OF NEVADA, ex.rel. NEVADA  
DEPARTMENT OF CORRECTIONS;  
DIRECTOR GREG COX, individually;  
WARDEN DWIGHT NEVEN, individually;  
ASSISTANT WARDEN TIMOTHY FILSON,  
individually; COT. RAMOS, individually;  
LIEUTENANT OLIVER, individually;  
CORRECTIONS OFFICER CASTRO,  
individually; CORRECTIONS OFFICER  
SMITH, individually; and DOES I-X, inclusive;  
and ROES I-X, inclusive,

Defendants.

CASE NO.: 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
PLAINTIFFS TO FILE A REPLY TO  
NDOC DEFENDANTS' RESPONSE TO  
PEREZ FAMILY'S MOTION TO  
RECONSIDER ORDER GRANTING  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT ON  
PLAINTIFFS' FOURTEENTH  
AMENDMENT LOSS OF FAMILIAL  
ASSOCIATION CLAIM**

Victor Perez, as Special Administrator of the Estate of Carlos Perez, deceased, by and through his counsel, Paola M. Armeni, Esq., and Gia N. Marina, Esq., the law firm of Clark Hill, Defendant Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., the law firm of Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their counsel, Craig Newby, Esq. and Kiel Ireland, Esq., the Attorney General's Office, Defendant Isaiah Smith, by and through his counsel of record, Jeffrey F. Barr, Esq., and Alina Shell, Esq. of the law firm of Armstrong Teasdale, and Defendant Jeff Castro, by

1 and through his counsel, Craig R. Anderson, Esq., of the law firm of Marquis Aurbach, hereby  
2 respectfully submit this Stipulation and Order Extending Time for Plaintiff to reply to NDOC  
3 Defendants' Response to Perez Family's Motion to Reconsider Order Granting Defendants'  
4 Motion for Summary Judgment on Plaintiffs' Fourteenth Amendment Loss of Familial  
5 Association Claim [Dkt 232] filed on December 12, 2022, which the response is currently due on  
6 December 19, 2022, to be extended an additional eight (8) days up to and including December 27,  
7 2022.

8 Although Plaintiffs' counsel has begun working on replying to Defendant's Response,  
9 counsel requires a brief extension to complete the Reply. This request for extension is made in  
10 good faith and not for the purposes of delay.

11 WHEREFORE, the parties stipulate that the time for Plaintiffs to file their reply to NDOC  
12 Defendants' Response to Perez Family's Motion to Reconsider Order Granting Defendants'

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Motion for Summary Judgment on Plaintiffs' Fourteenth Amendment Loss of Familial Association Claim [Dkt 232], be extended an additional eight (8) days up to and including December 27, 2022.

APPROVED AS TO FORM AND CONTENT.

Respectfully submitted this 15th day of December 2022.

**CLARK HILL, PLLC**

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*Attorneys for Defendants, State of Nevada,*

*Dwight W. Neven, James Greg Cox*

*Ronald Oliver, Timothy Filson*

**ORDER**

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: December 16, 2022